

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LIGHTHOUSE FINANCIAL GROUP,	:	Civil Action No. 1:11-cv-00398-GBD
Individually and on Behalf of All Others	:	
Similarly Situated,	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
THE ROYAL BANK OF SCOTLAND	:	
GROUP, PLC, et al.,	:	
	:	
Defendants.	:	
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ETHAN GOLD, Individually and on Behalf of	:	Civil Action No. 1:11-cv-01162-NRB
All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
THE ROYAL BANK OF SCOTLAND	:	
GROUP, PLC, et al.,	:	
	:	
Defendants.	:	
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IBEW LOCAL UNION NO. 58 PENSION TRUST FUND AND ANNUITY FUNDS' NOTICE
OF MOTION AND MOTION FOR APPOINTMENT AS LEAD PLAINTIFF AND
APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that proposed lead plaintiff IBEW Local Union No. 58 Pension Trust Fund and Annuity Fund (the “Pension and Annuity Funds”) will move this Court, on a date and at such time as may be designated by the Court, at 500 Pearl Street, New York, NY 10007, for an order: (1) appointing the Pension and Annuity Funds as lead plaintiff pursuant to the Private Securities Litigation Reform Act of 1995; and (2) approving the Pension and Annuity Funds’ selection of Robbins Geller Rudman & Dowd LLP as lead counsel. In support of this motion, the Pension and Annuity Funds submit the accompanying Memorandum of Law, the Declaration of David A. Rosenfeld and a [Proposed] Order.

DATED: April 19, 2011

ROBBINS GELLER RUDMAN
& DOWD LLP
SAMUEL H. RUDMAN
DAVID A. ROSENFELD

s/DAVID A. ROSENFELD
DAVID A. ROSENFELD

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[Proposed] Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on April 19, 2011, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 19, 2011.

s/ DAVID A. ROSENFELD

DAVID A. ROSENFELD

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Mailing Information for a Case 1:11-cv-00398-GBD

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Charles H. Dufresne , Jr**
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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

Ethan Gold

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Irving Firemen's Relief and Retirement Fund

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